EPSTEIN BECKER & GREEN, P.C.

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Attorneys for Defendant United States Health Clean Corporation d/b/a US Health Clean

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NEPHTY CRUZ and MICHAEL BALLETTO, as

TRUSTEES OF THE DISTRICT 6 INTERNATIONAL:
UNION OF INDUSTRIAL, SERVICE, TRANSPORT
AND HEALTH EMPLOYEES HEALTH PLAN and
THE DISTRICT 6 INTERNATIONAL UNION OF
INDUSTRIAL, SERVICE, TRANSPORT AND
HEALTH EMPLOYEES PENSION PLAN,

Plaintiffs,

- against -

US HEALTH CLEAN,

Defendant.

07 Civ. 6392 (LTS)(KNF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of David J. Clark, dated March 11, 2008, the accompanying Memorandum of Law, and upon all pleadings and prior proceedings in this action, Epstein Becker & Green, P.C. ("EBG"), will move this Court before the Honorable Kevin Nathaniel Fox, at the United States Courthouse, 500 Pearl Street, Courtroom 20A, New York, New York 10007, at a time to be determined by this Court, for an order permitting EBG to withdraw as counsel to Defendant United States Health Clean Corporation d/b/a US Health Clean in this action.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memoranda must be served within ten business days after service of this Notice of Motion, and any reply affidavits and memoranda of law shall be served within five business days after service of the answering papers.

Dated: March 11, 2008

New York, New York

EPSTEIN BECKER & GREEN, P.C.

By:

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NY:2472654v1

CERTIFICATE OF SERVICE

I, David J. Clark, an attorney admitted to practice before this court, hereby certify, under penalty of perjury, that on March 11, 2008, I caused a true copy of the attached Notice of Motion to be served by first class mail upon:

Marc A. Tenenbaum, Esq.
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